IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: Ryan Kathleen Hardie aka Ryan

K. Hardie aka Ryan Hardie

Debtor(s)

BK NO. 20-12399 MDC

Chapter 7

Nationstar Mortgage LLC d/b/a Mr. Cooper

Movant

VS.

Ryan Kathleen Hardie aka Ryan K. Hardie aka Ryan Hardie

Debtor(s)

TERRY P. DERSHAW

Trustee

NATIONSTAR MORTGAGE LLC D/B/A MR. COOPER'S NOTICE OF DEBTOR'S REQUEST FOR FORBEARANCE DUE TO THE COVID-19 PANDEMIC

Now comes Creditor Nationstar Mortgage LLC d/b/a Mr. Cooper ("Creditor"), by and through undersigned counsel, and hereby submits Notice to the Court of the Debtor's request for mortgage payment forbearance based upon a material financial hardship caused by the COVID-19 pandemic.

The Debtor recently contacted Creditor requesting a forbearance period of 6 months and has elected to not tender mortgage payments to Creditor that would come due on the mortgage starting 5/1/2020 through 10/1/2020. Creditor holds a secured interest in real property commonly known as 1195 Archer Lane Lansdale, PA 19446-5629. Creditor, at this time, does not waive any rights to collect the payments that come due during the forbearance period. If the Debtor desires to modify the length of the forbearance period or make arrangements to care for the forbearance period arrears, Creditor asks that the Debtor or Counsel for the Debtor make those requests through undersigned counsel.

Per the request, Debtor will resume Mortgage payments beginning 11/1/2020 and will be required to cure the delinquency created by the forbearance period (hereinafter "forbearance arrears"). Creditor has retained undersigned counsel to seek an agreement with Debtor regarding the cure of the forbearance arrears and submit that agreement to the Court for approval. If Debtor fails to make arrangements to fully cure the forbearance arrears, Creditor reserves it rights to seek relief from the automatic stay upon expiration of the forbearance period.

Respectfully Submitted,

/s/<u>Rebecca A. Solarz Esquire</u> Rebecca A. Solarz Esquire Attorney for Creditor Case 20-12399-mdc Doc 15 Filed 06/04/20 Entered 06/05/20 08:01:29 Desc Main Document Page 3 of 3

IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: Ryan Kathleen Hardie aka Ryan

K. Hardie aka Ryan Hardie

Debtor(s)

BK NO. 20-12399 MDC

Chapter 7

Nationstar Mortgage LLC d/b/a Mr. Cooper

Movant

Ryan Kathleen Hardie aka Ryan K. Hardie aka Ryan Hardie

VS.

Debtor(s)

TERRY P. DERSHAW,

Trustee

CERTIFICATE OF SERVICE

I, Rebecca A. Solarz of KML Law Group, P.C., certify that I am, and at all times hereinafter mentioned was, more than 18 years of age and that on June 4, 2020, I served the above captioned pleading, filed in the proceeding on the parties at the addresses shown below;

Debtor(s)

Ryan Kathleen Hardie aka Ryan K. Hardie aka Ryan Hardie 1195 Archer Lane Lansdale, PA 19446-5629

Attorney for Debtor(s) Mark M. Medvesky, Wells, Hoffman, Holloway & Medvesky LLP 601 E. Broad Street, Suite 110 Souderton, PA 18964

Trustee TERRY P. DERSHAW P.O. Box 556 Warminster, PA 18974-0632

Method of Service: electronic means or first class mail

Dated: June 4, 2020

/s/Rebecca A. Solarz Esquire

Rebecca A. Solarz Esquire Attorney I.D. 315936 KML Law Group, P.C. **BNY Mellon Independence Center** 701 Market Street, Suite 5000 Philadelphia, PA 19106 215-825-6327 rsolarz@kmllawgroup.com